

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE ROMEO POWER INC.  
SECURITIES LITIGATION

Case No. 1:21-cv-03362-LGS

**DECLARATION OF KARA M. WOLKE IN SUPPORT OF REPLY MEMORANDUM  
IN FURTHER SUPPORT OF PLAINTIFFS'  
MOTION FOR CLASS CERTIFICATION AND APPOINTMENT OF  
CLASS REPRESENTATIVES AND CLASS COUNSEL**

I, Kara M. Wolke, hereby declare:

1. I am a partner with the law firm Glancy Prongay & Murray LLP, counsel for Lead Plaintiff Mike Castleberg and additional plaintiffs Joshua Cante, Artur Chimchirian, Nathaniel Tapia, and Van Nguyen (“Plaintiffs”) and Lead Counsel for the Class in the above-captioned action. I am an attorney duly licensed to practice law in the State of California and I am admitted *pro hac vice* in this action. I have personal knowledge of the facts set forth herein and if called upon to testify, I could and would do so truthfully and accurately.

2. I make this declaration, together with the attached exhibits, in support of the Reply Memorandum in Further Support of Plaintiffs’ Motion for Class Certification and Appointment of Class Representatives and Class Counsel.

3. Attached as Exhibit 1 is a true and correct copy of excerpts of the transcript of Michael Castleberg, dated March 15, 2023.

4. Attached as Exhibit 2 is a true and correct copy of excerpts of the transcript of Joshua Cante, dated March 21, 2023.

5. Attached as Exhibit 3 is a true and correct copy of excerpts of the transcript of Nathaniel Tapia, dated March 29, 2023.

6. Attached as Exhibit 4 is a true and correct copy of excerpts of the transcript of Artur Chimchirian, dated April 6, 2023.

7. Attached as Exhibit 5 is a true and correct copy of excerpts of the transcript of Van Nguyen, dated April 7, 2023.

8. Attached as Exhibit 6 is a true and correct copy of excerpts of the transcript of Matthew D. Cain, PhD, dated April 11, 2023.

9. Attached as Exhibit 7 is a true and correct copy of Exhibit 48 to the deposition of Matthew D. Cain, PhD, dated April 11, 2023, reflecting warrant pricing data during the Class Period.

10. Attached as Exhibit 8 is a true and correct copy of docket entry number 56 in the case captioned *In re Alibaba Grp. Holding Ltd. Sec. Litig.*, No.1:15-md-02631-CM (S.D.N.Y. May 1, 2018), granting class certification and appointment of class representatives and class counsel.

I declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct. Executed this 3rd day of May 2023.

/s/ Kara M. Wolke

Kara M. Wolke

**PROOF OF SERVICE**

I hereby certify that on this 3rd day of May 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

s/ Kara M. Wolke  
Kara M. Wolke